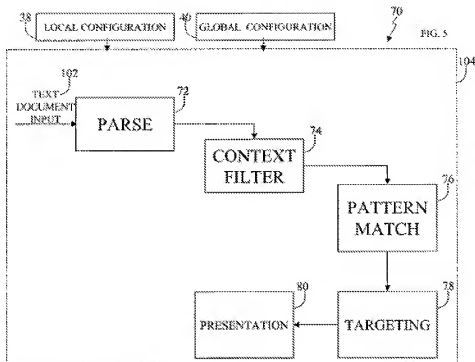## REMARKS

Claims 1, 3, 5-6, 9-11, 13-20, 22-24, 26-28 and 30 have been amended. Claims 8, 29 and 30 have been canceled.

## Section 103 Rejections

Claims 1, 3-5, 8-11, 13, 14, 17-20, 22, 23, and 26-33 are rejected under 35 U.S.C. § 103(a) for allegedly being unpatentable over Goodisman et al. (U.S. Patent Publication No. 2002/0069223, hereinafter "Goodisman") in view of Golovchinsky et al. (U.S. Patent Publication No. 2004/0078757, hereinafter "Golovchinsky").

Amended claim 1 recites, "locating a text reference in a source document using a trained statistical model of text formatting or lexical cues."

The Office Action alleged that Goodisman discloses deriving the text reference based on a statistical model of text formatting or lexical cues since Goodisman discloses "parsing the document based on the type of input document." However, the relied upon portion of Goodisman merely describes "parsing techniques" rather than the use of a statistical model, much less a trained statistical model.

As shown above in FIG. 5 from Goodisman, the linkify engine 104 receives a document 102 as input and processes the document using a parser 72 and a pattern matcher 76, neither of which disclose the use of a _trained statistical model._ In contrast, the parser 72 parses the document 102 into blocks based on one or more parsing techniques. See [0053]. For example, the parser 72 can divide the document 102 based on document format elements including HTML or XML tags, or textual elements including sentences, questions, line breaks, spaces, hyphens, dashes, strings of digits, strings of letters, groups of words, or images, icons, etc. _Id._ The pattern matcher 76 establishes relationships between the blocks. _Id._ Like the parser 72, the pattern matcher 76 also does not disclose use of a _trained statistical model_. Rather, the pattern matcher 76 can include a natural language processor or can perform linguistic, keyword proximity, or word sequence analysis. _Id._

Golovchinsky also fails to remedy the deficiencies of Goodisman.

Accordingly, claim 1 and its dependent claims are in condition for allowance. Claims 11 and 20, and their dependent claims, are in condition for allowance for at least the same reason as given for claim 1.

<div align="center">Conclusion</div>

All of the dependent claims are patentable for at least the same reasons as those for the claims on which they depend are patentable.

By responding in the foregoing remarks only to particular positions taken by the Examiner, Applicant does not acquiesce with other positions that have not been explicitly addressed. In addition, Applicant's arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that claim exist. Finally, Applicant's decision to amend or cancel any claim should not be understood as implying that Applicant agrees with any positions taken by the Examiner with respect to that claim or other claims.

The required extension of time fee in the amount of $1,110.00 is being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any additional charges or credits to our Deposit Account No. 06-1050.

Respectfully submitted,


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